

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Defendants.

$$\begin{array}{ccccccc} \vdots & \vdots & \vdots & \vdots & \vdots & \vdots & \vdots \\ -\mathbf{x} & & & & & & \end{array}$$

**MOTION FOR
ADMISSION OF COUNSEL
*PRO HAC VICE***

U.S. District Court for
the District of Columbia
Case No. 1:11-cv-00114
J.L.G.

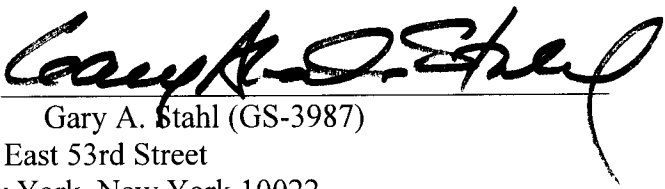
Angelique Palmer, Esq.
Stahl Cowen Crowley Addis LLC
56 West Monroe Street, Suite 1200
Chicago, Illinois 60603
(312) 641-0060 (tel.)
(312) 641-6959 (fax)
apalmer@stahlcowen.com

Mr. Schreiber and Ms. Palmer are members in good standing of the Bar of the State of Illinois. There are no pending disciplinary proceedings against Mr. Schreiber or Ms. Palmer in any State or Federal court.

Dated: New York, New York
April 2, 2008

Respectfully submitted,

CROWELL & MORING LLP

By: 
Gary A. Stahl (GS-3987)

153 East 53rd Street
New York, New York 10022
(212) 223-4000

Local Counsel for Defendant Heyman Corporation

TO: Steven Mitnick, Esq.
Mitnick & Malzberg, Esq.
29 Race Street
Frenchtown, New Jersey 08825
Attorneys for Plaintiff Sammart Fashion Co., Ltd.

Leslie Martin Shamis, Esq.
64 W. Park Ave., P.O. Box 570
Long Beach, New York 11561
Attorneys for Plaintiff Sammart Fashion Co., Ltd.

Jeremy Andrew Cohen, Esq.
Kramer, Levin, Naftalis & Frankel, LLP
1177 Avenue of the Americas
New York, New York 10036
Attorneys for Defendant Wear Me Apparel Corp.

CROWELL & MORING LLP
Gary A. Stahl (GS-3987)
153 East 53rd Street
New York, New York 10022
Attorneys for Defendant Heyman Corporation

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SAMMART FASHION CO., LTD.,

Plaintiff,

V.

**WEAR ME APPAREL CORP.,
d/b/a KIDS HEADQUARTERS and
HEYMAN CORPORATION,**

Defendants.

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STATE OF NEW YORK)

) SS.:

COUNTY OF NEW YORK)

GARY A. STAHL, being duly sworn, deposes and states as follows:

1. I am of counsel to Crowell & Moring LLP, which is local counsel for defendant Heyman Corporation in this action. I am fully familiar with the facts and prior proceedings in this case.

2. I submit this Declaration in support of defendant Heyman Corporation's motion for an Order, pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, granting admission *pro hac vice* of Scott N. Schreiber, Esq. and Angelique Palmer, Esq. so that they may appear before this Court and participate in this action as lead attorneys for Heyman Corporation.


[illegible]

3. I am a member in good standing of the bar of the State of New York, and I was admitted to the practice of law in New York on June 23, 1982. Since December 1982, I have been a member in good standing of the bar of the United States District Court for the Southern District of New York.

4. Mr. Schreiber is a partner with the firm of Stahl Cowen Crowley Addis LLC, which maintains its principal office for the practice of law at 56 W. Monroe Street, Chicago, Illinois 60603. Ms. Palmer is an associate at the same firm. Each of these attorneys is a member in good standing of the Illinois Bar. I respectfully refer the Court to the applications for admission *pro hac vice* submitted by Mr. Schreiber and Ms. Palmer, attached hereto as Exhibits A and B, respectively, which include their Certificates of Admission to the Bar of Illinois.

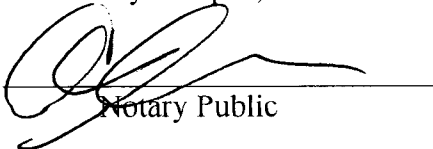
5. Mr. Schreiber and Ms. Palmer will be associated with me in the representation of Heyman Corporation in this action. I have known Mr. Schreiber and Ms. Palmer for several months, and have found them to be skilled attorneys and persons of integrity. Both are experienced in federal practice and familiar with the Federal Rules of Civil Procedure.

6. Accordingly, I respectfully move the admission of Scott N. Schreiber, Esq. and Angelique Palmer, Esq. *pro hac vice*, and request the Court to enter the proposed order, attached hereto as Exhibit C, granting their admission *pro hac vice*.


GARY A. STAHL

Sworn to before me this

2nd day of April, 2008


Notary Public

ALEXANDER GRANOVSKY
Notary Public, State of New York
No. 02080150072
Qualified in City of New York
Commission Expires 01/16/2011

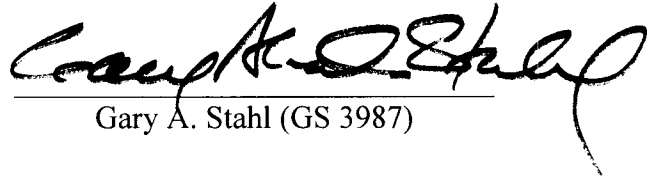
CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2008, I served the accompanying Notice of Motion, supporting Affidavit and all exhibits attached thereto by first-class mail, postage prepaid, upon the following attorneys of record:

Steven Mitnick, Esq.
Mitnick & Malzberg, Esq.
29 Race Street
Frenchtown, New Jersey 08825
Attorneys for Plaintiff Sammart Fashion Co., Ltd.

Leslie Martin Shamis, Esq.
64 W. Park Ave., P.O. Box 570
Long Beach, New York 11561
Attorneys for Plaintiff Sammart Fashion Co., Ltd.

Jeremy Andrew Cohen, Esq.
Kramer, Levin, Naftalis & Frankel, LLP
1177 Avenue of the Americas
New York, New York 10036
Attorneys for Defendant Wear Me Apparel Corp.



Gary A. Stahl (GS 3987)

STAHL COWEN CROWLEY ADDIS, LLC
Scott N. Schreiber (Il 06191042)
Angelique Palmer (Il 6282041)
55 W. Monroe, Suite 1200
Chicago, Il 60603
(312) 641-0060
(312) 641-6959 facsimile

Counsel for Heyman Corporation

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SAMMART FASHION CO., LTD.,

Plaintiff,

V.

**WEAR ME APPAREL CORP.,
d/b/a KIDS HEADQUARTERS and
HEYMAN CORPORATION,**

Defendants.

[illegible]

Case No.: 07 CV 4035 (DAB)

NOTICE OF MOTION

FILED
U.S. DISTRICT COURT
S.D. N.Y.
1980-3 PM 1:50

**MOTON FOR ADMISSION TO
PRACTICE, PRO HAC VICE OF SCOTT N. SCHREIBER**

I, Scott N. Schreiber a member in good standing of the bars of the State of Illinois and the United States District Courts for the Northern District of Illinois request admission, *pro hac vice*, to represent the Defendant, Heyman Corporation, in the above referenced case.

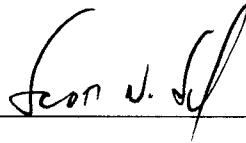
Mailing Address: Scott N. Schreiber
Stahl Cowen Crowley Addis, LLC
55 W. Monroe, Suite 1200
Chicago, IL 60603

Telephone: (312) 377-7766

E-Mail: sschreiber@stahlcowen.com

I have agreed to pay the fee of _____ upon approval of this Court admitting me to practice *pro hac vice* and submit a draft Order herewith for the Court's consideration.

Dated: Chicago, Illinois
March 12, 2008



Scott N. Schreiber
Illinois Bar No. 06191042
Stahl Cowen Crowley Addis, LLC
55 W. Monroe, Suite 1200
Chicago, IL 60603
sschreiber@stahlcowen.com

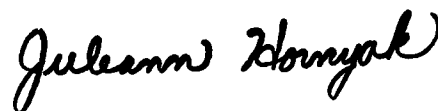
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Scott Neil Schreiber

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 7, 1985 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Tuesday, March 04, 2008.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

STAHL COWEN CROWLEY ADDIS, LLC
Scott N. Schreiber (Il 06191042)
Angelique Palmer (Il 6282041)
55 W. Monroe, Suite 1200
Chicago, Il 60603
(312) 641-0060
(312) 641-6959 facsimile

Counsel for Heyman Corporation

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SAMMART FASHION CO., LTD.,

Plaintiff,

v.

**WEAR ME APPAREL CORP.,
d/b/a KIDS HEADQUARTERS and
HEYMAN CORPORATION,**

Defendants.

Case No.: 07 CV 4035 (DAB)

NOTICE OF MOTION

**MOTON FOR ADMISSION TO
PRACTICE, PRO HAC VICE OF ANGELIQUE PALMER**

I, Angelique Palmer a member in good standing of the bars of the State of Illinois and the United States District Courts for the Northern District of Illinois request admission, *pro hac vice*, to represent the Defendant, Heyman Corporation in the above referenced case.

Mailing Address: Angelique Palmer
Stahl Cowen Crowley Addis, LLC
55 W. Monroe, Suite 1200
Chicago, IL 60603

Telephone: (312) 377-7761

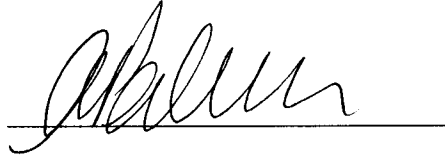
E-Mail: apalmer@stahlcowen.com

U.S. DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D.C. 20535
MAY 11 1964
S.D. OF N.Y.

I have agreed to pay the fee of _____ upon approval of this Court admitting me to practice *pro hac vice* and submit a draft Order herewith for the Court's consideration.

Dated: Chicago, Illinois

March 12, 2008

A handwritten signature in black ink, appearing to read 'A. Palmer', is written over a horizontal line.

Angelique Palmer
Illinois Bar No. 6282041
Stahl Cowen Crowley Addis, LLC
55 W. Monroe, Suite 1200
Chicago, IL 60603
apalmer@stahlcowen.com

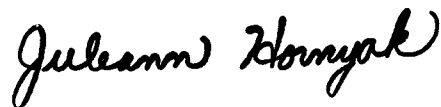
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Angelique Elaine Palmer

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on May 6, 2004 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Tuesday, March 04, 2008.

A handwritten signature in black ink that reads "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SAMMART FASHION CO., LTD.,

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**WEAR ME APPAREL CORP.,
d/b/a KIDS HEADQUARTERS and
HEYMAN CORPORATION,**

Defendants.

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Upon the motion of Gary A. Stahl, Esq., of the firm of Crowell & Moring LLP, attorneys for Defendant Heyman Corporation, for the admission *pro hac vice* of Scott N. Schreiber, Esq. and Angelique Palmer, Esq., and upon said sponsoring attorney's affidavit, sworn to on April 2, 2008 in support;

IT IS HEREBY ORDERED that

Scott N. Schreiber, Esq.
Stahl Cowen Crowley Addis LLC
56 West Monroe Street, Suite 1200
Chicago, Illinois 60603
(312) 641-0060 (tel.)
(312) 641-6959 (fax)
sschreiber@stahlcowen.com

Angelique Palmer, Esq.
Stahl Cowen Crowley Addis LLC
56 West Monroe Street, Suite 1200
Chicago, Illinois 60603
(312) 641-0060 (tel.)
(312) 641-6959 (fax)
apalmer@stahlcowen.com

are admitted to practice *pro hac vice* as counsel for Defendant Heyman Corporation in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court

SO ORDERED this _____ day of April, 2008

U.S.D.J.